

**UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

OLGA MARQUEZ and EDUARDO MARQUEZ,)	
)	
Plaintiffs,)	
)	
versus)	No. 08 C 990
)	
TARGET CORPORATION,)	
)	
Defendant.)	

REPORT OF PARTIES' PLANNING CONFERENCE

1. Pursuant to this court's order, Jeffrey A. Schulkin representing the plaintiffs, and Michael J. McGowan, representing the defendant, met on March 5, 2008 pursuant to Rule 26(f) to discuss:

- (1) the nature and basis of their claims and defenses;
- (2) the possibilities for a prompt settlement or resolution of this case;
- (3) to make or arrange for the disclosures required under Rule 26(a)(1); and
- (4) to develop a discovery plan.

To that end, the parties propose the following:

2. **Pre-Discovery Disclosures.** The parties will exchange the information required by Fed.R.Civ.P.26(a)(a) by March 21, 2008.

3. **Discovery Plan.** The parties jointly propose to the court the following discovery plan:

Discovery will be needed on the following subjects:

- a) the cause of the water being on the floor;
- b) notice to the Defendant of the water being on the floor; and
- c) the nature and extent of Plaintiff's injuries and damages, including spinal surgery.

All fact discovery, including medical discovery, to be completed by December 31, 2008.

Maximum of 35 interrogatories by each party to any other party.

Maximum of 15 depositions by plaintiffs, and 15 by defendants.

Reports from retained experts under Rule 26(a)(2) due:

- from Plaintiffs by January 28, 2009;
- from Defendant by March 28, 2009.

4. **Other Items**

The parties request a conference with the court before entry of the scheduling order.

Plaintiffs should be allowed until July 7, 2008 to join additional parties.

Defendant should be allowed until August 7, 2008 to join additional parties.

All potentially dispositive motions should be filed by April 28, 2009.

Settlement cannot be evaluated prior to conducting discovery on the cause of the water being on the floor, notice of same to the Defendant, and the nature and extent of Plaintiff's injuries and damages in this matter.

Final lists of witnesses and exhibits under Rule 26(a)(3) should be due:

- from Plaintiffs by May 28, 2009;
- from Defendant by June 28, 2009.

Parties should have 30 days after service of final lists of witnesses and exhibits to list objections under Rule 26(a)(3).

This case should be ready for trial by September 15, 2009.

Date: March 6, 2008

Respectfully submitted,

s/ Jeffrey A. Schulkin
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